

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

STATE OF NEW JERSEY,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
TRANSPORTATION, et al.,

Defendants.

Case No. 2:23-CV-03885-LMG-LDW

**DECLARATION OF RANDY M.
MASTRO IN SUPPORT OF CAMILLA
AKBARI'S APPLICATION FOR
ADMISSION *PRO HAC VICE***

Randy M. Mastro, hereby declares pursuant to 28 U.S.C. § 1746:

1. I am an attorney-at-law of the State of New Jersey, a member in good standing of this Court, and an attorney at the law firm of King & Spalding LLP, and I represent Plaintiff State of New Jersey in this action.

2. I am fully familiar with the facts as stated herein, and I submit this Declaration in support of the Plaintiff State of New Jersey's application for the admission *pro hac vice* of Camilla Akbari to the Bar of this Court in this action.

3. There is good cause for the admission *pro hac vice* in this matter of Ms. Akbari. As set forth in her accompanying Declaration, Ms. Akbari is a member in good standing and eligible to practice before the courts in the State of New York.

4. To the best of my knowledge, Ms. Akbari has never been the subject of any disciplinary proceeding by any court or other authority and has never been suspended or disbarred by any court.

5. As set forth in her accompanying Declaration, Ms. Akbari is familiar with the facts of this case. It would be in the best interest of the Plaintiff State of New Jersey for her to be admitted *pro hac vice* on their behalf in this action.

6. If this Court grants Ms. Akbari's admission *pro hac vice*, Ms. Akbari understands that she must abide by all applicable Rules of Court, including all local rules and all disciplinary rules.

7. All pleadings, briefs, and other papers filed with the Court shall be signed by a member or associate of the law firm of King & Spalding, attorneys of record for the Plaintiff State of New Jersey, who is admitted to the Bar of this Court and shall be held responsible for said papers and for the conduct of the case and who will be held responsible for the conduct of the attorney admitted hereby.

8. If this Court grants Ms. Akbari's admission *pro hac vice*, I will undertake to ensure that Ms. Akbari pays the annual fee to the New Jersey Lawyers' Fund for Client Protection in accordance with L. CIV. R. 101.1(c)(2) and New Jersey Court Rule 1:28-2(a) within twenty (20) days from the date of entry of the order granting her admission, and will continue to do so for each year he continues to represent the Plaintiff State of New Jersey.

9. If this Court grants Ms. Akbari's admission *pro hac vice*, I will undertake to ensure that Ms. Akbari makes the payment of \$250.00 to the Clerk, United States District Court in accordance with L. CIV. P. 101.1(c)(3).

10. Based on the foregoing reasons, I respectfully request that this Court enter the accompanying Order admitting Camilla Akbari *pro hac vice* in this matter

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 25, 2024

/s/ Randy M. Mastro
Randy M. Mastro